Serial No.: 10/812,172 Attorney's Docket No.: H0005492-5601

Art Unit: 2682 Page 6

REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-19 remain pending in this application. Claim 1 has been amended to more clearly recite features of the present invention.

Applicants acknowledge with appreciation the allowance of claims 9-19. However, for the reasons stated below, Applicants respectfully submit that rejected claims 1-8 are also in condition for allowance.

Claims 1-8 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Groves (US 2004/0012522 A1) in view of Kain et al (US 5,894,323). This ground of rejection is respectfully traversed.

Amended independent claim 1 recites a processor (e.g., element 12) that receives RF position data (e.g., GPS) and inertial measurement unit (IMU) data. A receiver antenna (e.g., element 22) supplies the RF position data to the processor, and an IMU, which is co-located with the receiver antenna, provides the IMU data to the processor. A single coaxial cable (e.g., element 30) that connects two subsystems, which house the processor and co-located receiver antenna and IMU, has two functions: (1) supplying DC power to the IMU and (2) carrying the RF position data and the IMU data from the RF receiver antenna and IMU, respectively, to the processor.

Groves is cited for disclosing an integrated (tightly coupled) INS/GPS system. The Examiner acknowledges that Groves does not disclose the claimed receiver antenna or single coaxial cable (Office Action, p. 3). The Examiner asserts, however, that the Kain et al. reference

Serial No.: 10/812,172 Attorney's Docket No.: H0005492-5601

Art Unit: 2682 Page 7

overcomes the deficiencies of Groves. Applicants acknowledge and agree that Kain et al.

disclose a GPS antenna. However, Applicants disagree that Kain et al. disclose a coaxial cable that connects two subsystems and carries the signals required by amended claim 1.

Specifically, Kain et al. disclose a cable 86 that connects electronics unit 84 and stabilized platform assembly 80. Col. 5, lines 7-10 of Kain et al. state: "A stabilized platform assembly 80 includes cameras 20, 22 and 24, IMU 40, motors 60 and 62 and additional components described below."

Also, col. 5, lines 13-18 of Kain et al. state: "The electronics unit 84 includes system computer 30, disk storage unit 32, GPS receiver 46, RF modem 52, frame grabber 28, IMU interface 42, motor amplifiers 64 and 66, power supply 70 and display 72. The electronics unit 84 is interconnected to stabilized platform assembly 80 by a cable 86."

In view of the functionality described, cable 86 could not possibly be a single coaxial cable, but must rather be a multi-wire cable that handles many different kinds of signals and power supply requirements. Amended claim 1, in contrast, requires a single coaxial cable that spans two subsystems and simultaneously supplies direct current (DC) power to an IMU and transmits RF position data and IMU data to a processor. Kain et al. do not disclose such a single coaxial cable with the claimed functionality. As such, Applicant's submit that a *prima facie* case of obviousness cannot be maintained against amended claim 1.

Based at least on these reasons, the pending grounds of rejection should be withdrawn.

In view of the foregoing all the claims in this application are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is

Serial No.: 10/812,172 Attorney's Docket No.: H0005492-5601

Art Unit: 2682 Page 8

desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

PILLSBURY WINTHROP SHAW PITTMAN LLP

1650 Tysons Boulevard McLean, VA 22102

Tel: 703/770-7900

Date: April 17, 2006

Respectfully submitted,

Lawrence D. Eisen

Registration No. 41,009

LDE/dkp

Customer No. 00128

PLEASE CONTINUE TO SEND OFFICIAL CORRESPONDENCE TO:

By:

HONEYWELL INTERNATIONAL, INC. 101 COLUMBIA ROAD MORRISTOWN, NJ 07962